

Designated Metropolitan Statistical Areas (MSAs) to be Opened for Porting May 24, 2004:							
MSA NAME	State	Date LNP Capable	CLLI Code of Switch Serving MSA	MSA NAME	State	Date LNP Capable	CLLI Code of Switch Serving MSA
Bethel	AK			Garfield	CO		
Anniston	AL			Kiowa	CO		
Cleburne	AL			Logan	CO		
Dothan	AL			Moffat	CO		
Florence	AL			Park	CO		
Franklin	AL			Pueblo	CO		
Gadsden	AL			Saguache	CO		
Huntsville	AL			San Miguel	CO		
Jackson	AL			Bridgeport	CT		
Lee	AL			New Haven	CT		
Montgomery	AL			Windham	CT		
Tuscaloosa	AL			Kent	DE		
Washington	AL			Calhoun	FL		
Clay	AR			Citrus	FL		
Cross	AR			Collier	FL		
Hempstead	AR			Dixie	FL		
Ouachita	AR			Fort Walton Beach	FL		
Polk	AR			Gainesville	FL		
Coconino	AZ			Glades	FL		
Gila	AZ			Hamilton	FL		
Graham	AZ			Hardee	FL		
Mohave	AZ			Jefferson	FL		
Navajo	AZ			Lakeland	FL		
Yuma	AZ			Monroe	FL		
Alpine	CA			Ocala	FL		
Chico	CA			Panama City	FL		
Del Norte	CA			Putnam	FL		
Imperial	CA			Tallahassee	FL		
Kings	CA			W. Palm Beach	FL		
Madera	CA			Walton	FL		
Mendocino	CA			Albany	GA		
Modoc	CA			Athens	GA		
Mono	CA			Bleckley	GA		
Oxnard	CA			Chattooga	GA		
Redding	CA			Columbus	GA		
Salinas	CA			Dawson	GA		
San Luis Obispo	CA			Early	GA		
Santa Barbara	CA			Hancock	GA		
Santa Cruz	CA			Heralson	GA		
Sierra	CA			Jasper	GA		
Tehama	CA			Liberty	GA		
Vallejo	CA			Macon	GA		
Yuba City	CA			Marion	GA		

Costilla	CO		Savannah	GA
Elbert	CO		Spalding	GA
Fort Collins, Lovind	CO		Toombs	GA
Warren	GA		Kosciusko	IN
Whitfield	GA		Lafayette	IN
Worth	GA		Miami	IN
Hawaii	HI		Muncie	IN
Kauai	HI		Newton	IN
Maui	HI		Owen	IN
Audubon	IA		Randolph	IN
Cedar Rapids	IA		South Bend	IN
Dubuque	IA		Terre Haute	IN
Humboldt	IA		Warren	IN
Ida	IA		Brown	KS
Iowa City	IA		Elk	KS
Jackson	IA		Franklin	KS
Lyon	IA		Lawrence	KS
Mills	IA		Topeka	KS
Monona	IA		Clay	KY
Muscatine	IA		Fulton	KY
Union	IA		Mason	KY
Winneshiek	IA		Owensboro	KY
Davenport	IA, IL		Powell	KY
Sioux City	IA, NE		Trimble	KY
Boundary	ID		Union	KY
Boundary	ID		Alexandria	LA
Butte	ID		Beauregard	LA
Clark	ID		Caldwell	LA
Elmore	ID		Claiborne	LA
Idaho	ID		De Soto	LA
Lemhi	ID		Iberville	LA
Adams	IL		Lafayette	LA
Bureau	IL		Lake Charles	LA
Clay	IL		Monroe	LA
Decatur	IL		Morehouse	LA
Jo Daviess	IL		Plaquemines	LA
Joliet	IL		Shreveport	LA
Kankakee	IL		St. James	LA
Mason	IL		West Feliciana	LA
Mercer	IL		Barnstable	MA
Montgomery	IL		New Bedford	MA
Peoria	IL		Pittsfield	MA
Rockford	IL		Frederick	MD
Springfield	IL		Kent	MD
Vermilion	IL		Oxford	ME
Washington	IL		Portland	ME
Anderson	IN		Alger	MI
Bloomington	IN		Benton Harbor	MI

Brown	IN		Cass	MI	
Decatur	IN		Cheboygan	MI	
Evansville	IN		Gogebic	MI	
Huntington	IN		Muskegon	MI	
Kokomo	IN		Newaygo	MI	
Roscommon	MI		Northampton	NC	
Tuscola	MI		Pitt	NC	
Duluth	MN		Yancey	NC	
Goodhue	MN		Barnes	ND	
Lake	MN		Bismarck	ND	
Barton	MO		Bottineau	ND	
Bates	MO		Divide	ND	
Benton	MO		Grand Forks	ND	
Callaway	MO		Kidder	ND	
De Kalb	MO		McKenzie	ND	
Harrison	MO		Carroll	NH	
Joplin	MO		Coos	NH	
Linn	MO		Atlantic City	NJ	
Maries	MO		Hunterdon	NJ	
Moniteau	MO		Long Branch	NJ	
Perry	MO		New Brunswick	NJ	
Saline	MO		Ocean	NJ	
Shannon	MO		Sussex	NJ	
St. Joseph	MO		Trenton	NJ	
Stoddard	MO		Catron	NM	
Benton	MS		Colfax	NM	
Biloxi, Gulfport	MS		Grant	NM	
Bolivar	MS		Las Cruces	NM	
Claiborne	MS		Lincoln	NM	
Copiah	MS		San Juan	NM	
Lamar	MS		Santa Fe	NM	
Montgomery	MS		Humboldt	NV	
Pascagoula	MS		Lander	NV	
Tunica	MS		Mineral	NV	
Yalobusha	MS		Reno	NV	
Beaverhead	MS		Storey	NV	
Billings	MT		White Pine	NV	
Carbon	MT		Binghamton	NY	
Daniels	MT		Chautauqua	NY	
Deer Lodge	MT		Columbia	NY	
Fergus	MT		Elmira	NY	
Great Falls	MT		Franklin	NY	
Lincoln	MT		Glens Falls	NY	
Mineral	MT		Jefferson	NY	
Prairie	MT		Orange County	NY	
Toole	MT		Otsego	NY	
Anson	NC		Poughkeepsie	NY	
Asheville	NC		Yates	NY	

Burlington	NC			Ashtabula	OH		
Cabarrus	NC			Canton	OH		
Camden	NC			Clinton	OH		
Cherokee	NC			Dayton	OH		
Fayetteville	NC			Hancock	OH		
Henderson	NC			Lima	OH		
Hickory	NC			Mansfield	OH		
Mercer	OH			Laurens	SC		
Morrow	OH			Oconee	SC		
Ross	OH			Corson	SD		
Sandusky	OH			Custer	SD		
Williams	OH			Haakon	SD		
Cimarron	OK			Hanson	SD		
Enid	OK			Harding	SD		
Garvin	OK			Kingsbury	SD		
Grant	OK			McPherson	SD		
Harper	OK			Rapid City	SD		
Haskell	OK			Sioux Falls	SD		
Jackson	OK			Sully	SD		
Lawton	OK			Bledsoe	TN		
Nowata	OK			Cannon	TN		
Clatsop	OR			Fayette	TN		
Coos	OR			Giles	TN		
Crook	OR			Hamblen	TN		
Eugene, Springfield	OR			Lake	TN		
Hood River	OR			Macon	TN		
Lincoln	OR			Maury	TN		
Medford	OR			Clarksville	TN, KY		
Umatilla	OR			Abilene	TX		
Altoona	PA			Amarillo	TX		
Bedford	PA			Atascosa	TX		
Bradford	PA			Beaumont	TX		
Crawford	PA			Briscoe	TX		
Erie	PA			Brownsville	TX		
Greene	PA			Burleson	TX		
Huntington	PA			Chambers	TX		
Jefferson	PA			Cherokee	TX		
Johnstown	PA			Concho	TX		
McKean	PA			Corpus Christi	TX		
Northeast	PA			Dallam	TX		
Potter	PA			Edwards	TX		
Reading	PA			Fannin	TX		
Sharon	PA			Gaines	TX		
State College	PA			Galveston	TX		
Union	PA			Hansford	TX		
Williamsport	PA			Hardeman	TX		
York	PA			Hudspeth	TX		

Newport	RI		Jack	TX		
Calhoun	SC		Killeen, Temple	TX		
Cherokee	SC		Laredo	TX		
Chesterfield	SC		Longview, Marsall	TX		
Clarendon	SC		Loving	TX		
Florence	SC		Lubbock	TX		
Georgetown	SC		Midland	TX		
Hampton	SC		Navarro	TX		
Lancaster	SC		Newton	TX		
Odessa	TX		La Crosse	WI		
Parmer	TX		Marinette	WI		
Reeves	TX		Pierce	WI		
Runnels	TX		Sheboygan	WI		
San Angelo	TX		Trempealeau	WI		
Sherman, Denison	TX		Vernon	WI		
Texarkana	TX		Vilas	WI		
Tyler	TX		Wausau	WI		
Victoria	TX		Wood	WI		
Waco	TX		Grant	WY		
Wichita Falls	TX		Mason	WY		
Wilson	TX		Wetzel	WY		
Beaver	UT		Casper	WY		
Box Elder	UT		Converse	WY		
Carbon	UT		Lincoln	WY		
Juab	UT		Niobrara	WY		
Morgan	UT		Park	WY		
Piute	UT		Sheridan	WY		
Amelia	VA		Santa Rosa, Petaluma	CA		
Bath	VA		Visalia, Tulare	CA		
Bedford	VA		New London	CT		
Buckingham	VA		Waterloo, Cedar Falls	IA		
Caroline	VA		Aurora, Elgin	IL		
Danville	VA		Bloomington, Normal	IL		
Frederick	VA		Champaign, Urbana	IL		
Giles	VA		Elkhart, Goshen	IN		
Greensville	VA		Houma, Thibodaux	LA		
Highland	VA		Lewiston, Auburn	ME		
Lee	VA		Saginaw, Bay, Midland	MI		
Madison	VA		Fargo, Moorhead	ND, MN		
Roanoke	VA		Manchester, Nashua	NH		
Tazewell	VA		Vineland, Millville	NJ		
Addison	VT		Utica, Rome	NY		
Burlington	VT		Lorain, Elyria	OH		

Franklin	VT			Steubenville, Weirton	OH		
Bellingham	WA			Bryan, College St	TX		
Bremerton	WA			Provo, Orem	UT		
Clallam	WA			Richland, Kennewick	WA		
Ferry	WA			Janesville, Beloit	WI		
Grays Harbor	WA			Appleton	WI		
Kittitas	WA			Columbia	WI		
Okanogan	WA			Door	WI		
Olympia	WA			Green Bay	WI		
Whitman	WA			Kenosha	WI		
Yakima	WA						

Network Operations Support



May 28, 2003

Cascade Utilities, Inc.
PO Box 189
Estacada, OR 97023

Verizon Wireless
Interconnection/Numbering/Mandates
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598

Attn: Brenda Crosby,

Consistent with the rules of the Federal Communications Commission ("FCC"), on November 24, 2003, Verizon Wireless will begin competitive porting by offering customers local number portability ("LNP").²⁰⁵ The FCC sought to simplify the task of identifying the switches in each MSA in which number portability is deployed and to facilitate competitive entry.²⁰⁶ The FCC's rules require local exchange carriers to make available, upon request by any interested party, a list of their switches for which provisioning of number portability has been requested (and therefore provided) and a list of their switches for which provisioning of number portability has not been requested.²⁰⁷ Verizon Wireless requires only a list of switches and NPA-NXX codes for which provisioning of LNP has not been requested.

Verizon Wireless has simplified this request by attaching a form containing a list of switches and codes for your review. This list was derived by using the LERG and comparing it to Verizon Wireless's licensed service areas. The list identifies the switch CLLI and NPA-NXX codes that Verizon Wireless believes are not yet LNP capable. Please review and update the attached form, making any necessary changes or additions to the list regarding switches and codes that have not been marked portable. Please indicate the date by which the switch and codes will be LNP capable.²⁰⁸ Any comments can be made in the column provided on the form.

Verizon Wireless requests that you review, update and return the attached form to the undersigned contact within 10 days of receipt. Please call the undersigned with any questions or concerns.

Linda Godfrey
Verizon Wireless
Interconnection, Numbering and Mandates

925-279-6570

Enclosures

²⁰⁵ See 47 C.F.R. § 52.31.

²⁰⁶ Local Number Portability, *First Memorandum Opinion and order on Reconsideration*, 12 FCC Rcd. 7236, ¶¶59-66 (1997).

²⁰⁷ *Id.* at ¶64; 47 C.F.R. § 52.23(b)(2)(iii).

²⁰⁸ The timeframes for conversion to LNP of any additional switches are governed by the FCC's rules and range from 30 days to 180 days, depending upon the status of the switches (*i.e.*, equipped remote, hardware capable, capable switches requiring hardware, and non-capable). 47 C.F.R. § 52.23 (b)(2)(iv)(A-D).

Bonafide Request Form (BFR)

Purpose:

The purpose of this letter is to request the deployment of long-term Local Number Portability as defined by the FCC. Specifically, this form requests that ALL codes serving the Metropolitan Statistical Areas be opened for portability in the LERG and the NPAC and ALL switches serving these areas are LNP capable.

Note: MSAs refers to the identified U.S. Census Bureau MSAs for 2000. These may differ from the MSAs as separately defined by the wireless or wireline industries. In those instances where no MSA has been identified please reference Rate Center to ensure switches and NPA-NXXs serving those areas are opened for porting.

<u>TO (RECIPIENT):</u>	
Company Name: _____ Contact Name: _____ Contact's Address: _____ _____ Contact's Email: _____ Contact's Fax: _____ Contact's Phone: _____	If LERG contact info is incorrect, please change below.

<u>FROM (REQUESTOR):</u>	
Company Name: Contact Name: Contact's Address: Contact's Email: Contact's Fax: Contact's Phone:	Celco Partnership d/b/a Verizon Wireless Linda Godfrey 2785 Mitchell Drive Walnut Creek, CA 94598 Building 7-1, 7111G Linda.Godfrey@Verizonwireless.com 925-279-6621 925-279-6570

Timing:

Date of Request:	May 19, 2003
Receipt Confirmation Due By:	May 29, 2003 <i>(Due no later than 10 days after the date of the request.)</i>
Effective Date:	November 24, 2003 or May 24, 2004 pursuant to the FCC rules

**Wireline Bonafide Request form (BFR) for Local Numebr Portability
Cascade Utilities Nonportable NPA-NXXs and CLLIs**

COC TYPE	ST	RATE_CNTR	PORTABLE	NPA	NXX	Date NPA- NXX marked Portable	Comments	SOF 38-LNP	SWITCH	Date Portable	Comments
EOC	IA	OTTERCREEK	N	563	686			-	OTCKIAXODS0		
EOC	IA	CASCADE	N	563	852			-	CSCDIAXODS0		



Sprint PCS

6580 Sprint Parkway
Mailstop: KSOPHW0516-5B360
Overland Park, KS 66251
(913) 794-9486
fromig01@sprintspectrum.com

May 16, 2003

C.U.

Cascade Utilities

To Whom It May Concern:

Enclosed is the Bonafide Request Form (BFR) as required by the FCC mandate (CC Docket 95-116) to request deployment of long term Local Number Portability. CMRS providers are required to provide LNP by November 24, 2003. This BFR is being sent in anticipation of that date. Please note the effective date requested reflects this requirement.

Please feel free to contact me at the numbers and email address provided above. Alternatively, you may contact Jeff Adrian at phone number (407) 622-4170 or at email address: jadria01@sprintspectrum.com if you need assistance.

Sincerely,

Fawn Romig
Industry Compliance and Operational Network Support
Numbering Solutions

Enclosure

Bonafide Request Form (BFR)

Purpose:
FCC

Number Portability as defined in the
ALL codes be opened for portability
designated below. This form may be

TO (RECIPIENT):

OCN: 2371
Company Name: CASCADE UTILITIES, INC.

Contact Name: BRENDA CROSBY
Contact's Address:
PO BOX 189
ESTACADA OR 97023

Contact's Email:
Contact's Fax:
Contact's Phone: 503-630-4202

FROM (REQUESTOR):

Company Name: Sprint PCS

Contact Name: Fawn Romig
Contact's Address: 6580 Sprint Parkway
Mailstop: KSOPHW0516-5B360
Overland Park, KS 66210
Contact's Email: fromig01@sprintspectrum.com
Contact's Fax: (913) 523-8333
Contact's Phone: (913) 794-9486

TIMING:

Date of Request: May 23, 2003

Receipt Confirmation Due By: June 9, 2003

(Due no later than 10 days after the Date
of Request)

Effective Date: November 24, 2003

Designated Metropolitan Statistical Areas (MSAs):

Note: MSAs refer to the U.S. Census Bureau MSAs. These may differ from the MSAs as separately defined by the wireless or wireline industries.

MSA_NAME:

Portland-Vancouver, OR-WA

Renote

Designated Wireline Switch CLLI Codes):

1st CLLI: EGCKORXXRS0

2nd CLLI:

3rd CLLI:

4th CLLI:

5th CLLI:

6th CLLI:

Actions Required of the Recipient:

1. Within 10 days of receipt, provide confirmation to the requester that this form has been received.
2. For all currently released codes, and those to be released at any future time, within the designated U.S. Census Bureau MSAs and wireline switch CLLI codes (where applicable), open all for porting within the LERG.
3. For all currently released codes, and those to be released at any future time, within the designated U.S. Census Bureau MSAs and wireline switch CLLI codes (where applicable), open all for porting within the NPAC (Number Portability Administration Center).
4. Ensure that all switches handling codes within the designated MSAs are Local Number Portability capable.

Wednesday, May 07, 2003

BFR Checklist Form v04 020204.doc

EXHIBIT 2

KRASKIN, LESSE & COSSON, LLC
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

July 15, 2003

VIA E-MAIL & OVERNIGHT DELIVERY

Shannon Reilly
Corporate Counsel - Regulatory Affairs
T-Mobile USA, Inc.
12920 SE 38th St.
Bellevue, WA 98006

Dear Ms. Reilly:

Thank you for confirming that the generic mailings from T-Mobile USA, Inc. ("T-Mobile") regarding number portability do not apply to the companies listed in our March 31, 2003 and April 14, 2003 correspondence, that provide service outside the top 100 MSAs.

In addition to the companies listed in the March 31st and April 14th correspondence, we represent five other local exchange carrier ("LEC") clients -- Bentleyville Communications Corp. (PA), Big Sandy Telecom (CO), Cascade Utilities, Inc.(OR), Chouteau Telephone Company (OK) and Clay County Rural Telephone Cooperative, Inc. (IN) -- that provide local exchange service in portions of the top 100 MSAs.¹ Having analyzed the generic letters and accompanying forms dated February 21, 2003 (collectively, the T-Mobile "generic mailings") sent to these companies, we question whether they constitute a valid request for number portability. Moreover, even if the generic mailings were sufficient, the T-Mobile correspondence does not request service provider portability that would enable customers of these LECs to retain their existing telephone numbers "at the same location" as the Act and FCC Rules require.²

As you are aware, the generic mailing was directed "To Whom It May Concern." In many instances, our client recipient is an entity that operates more than one company. Accordingly, the correspondence lacks specificity as to which carrier the purported request was directed. Moreover, neither the letter nor the form provided with the T-Mobile generic mailing contains any specific information about the geographic area served by the LEC,³ the switches for

¹ Company addresses for the first four companies were provided on the list attached to our letter dated March 31, 2003. The address for Clay County Rural Telephone Cooperative, Inc. is 2 S. West Street, Cloverdale, Indiana 46120.

² See 47 U.S.C. § 153(30); 47 C.F.R. § 52.21(k).

³ *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability:*